



SDMS DocID

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Mobil Oil Corporation

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(Red)

May 20, 1988

Mr. Lawrence Falkin
USEPA - Region III
CERCLA, Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia, PA 19107

METRO CONTAINER CORPORATION ET AL.

Gentlemen:

Under separate cover we are enclosing the balance of the copies of the documents that are responsive to your demand of April 12, 1988 concerning the above Superfund Site. Basically, the documents demonstrate Mobil's business relationship with Metro Container Corporation and its various affiliates or subsidiaries. Mobil's operations consisted mainly of arrangements between Metropolitan Container Corporation and the Paulsboro Refinery, although Mobil's marketing function was also involved.

In summary, the documents (or the lack thereof) indicate the following:

1. Mobil did not generate or transport hazardous substances or dispose of same at the subject site. The residual, if any, in the drum sent for reconditioning were, Mobil contends, petroleum or petroleum products exempt under the CERCLA.
2. The quantities and residual contents of any unwashed 55 gallon drums sent to the site are, at this time, undocumented and we do not believe that such data can be developed from Mobil's records but, assuming hypothetically that such data could be developed, we believe that the materials would qualify for the petroleum exemption contained in the CERCLA.

3. The dates of transportation may be found on the transportation invoices provided you.
4. All existing correspondence that we believe relevant is included with the documents.
5. See paragraph 4.
6. The identity of other generators known to Mobil may be obtained from the documents produced (i.e., those Mobil customers that returned used drums to Metropolitan Container Corporation).
7. We did not find and do not believe that there are any real estate documents indicating that Mobil had or has any real estate interest in the subject site.
8. The identity of the corporations that Mobil dealt with can be determined from the documents produced.

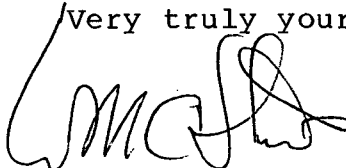
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In regard to insurance, while Mobil has had over the years various types of insurance coverage, there is no present purpose to be served in developing the names of the carriers since Mobil is of such a financial worth as to be able to respond to any reasonable amount of liability under Superfund notwithstanding insurance coverages, although we do not admit to any such liability.

We trust the documents forwarded together with the above is fully responsive to your April 12, 1988 demand. It required the additional time to produce our response because of the significant number of documents and the number of sources we were required to review.

Thank you for your cooperation in providing the extension of time in which to respond to your demand.

Very truly yours,



W. C. Streets

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